DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration
10903 New Hampshire Avenue
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Silver Spring, MD 20993-0002

Medtronic Sofamor Danek USA, Incorporated
Mr. Nicholas Tabrizi
Principal Regulatory Affairs Specialist
1800 Pyramid Place
Memphis, Tennessee 38132

June 16, 2015

Re: K150231
Trade/Device Name: Navigated Disc Prep Instruments and CAPSTONE Trials
Regulation Number: 21 CFR 882.4560
Regulation Name: Stereotaxic instrument
Regulatory Class: Class II
Product Code: OLO
Dated: May 13, 2015
Received: May 14, 2015

Dear Mr. Tabrizi:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration. Please note: CDRH does not evaluate information related to contract liability warranties. We remind you, however, that device labeling must be truthful and not misleading.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); medical device reporting (reporting of medical device-related adverse events) (21 CFR 803); good manufacturing practice requirements as set

forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Division of Industry and Consumer Education at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding the reporting of adverse events under the MDR regulation (21 CFR Part 803), please go to http://www.fda.gov/MedicalDevices/Safety/ReportaProblem/default.htm for the CDRH's Office of Surveillance and Biometrics/Division of Postmarket Surveillance.

You may obtain other general information on your responsibilities under the Act from the Division of Industry and Consumer Education at its toll-free number (800) 638-2041 or (301) 796-7100 or at its Internet address http://www.fda.gov/MedicalDevices/ResourcesforYou/Industry/default.htm.

Sincerely yours,

Mark N. Melkerson -S

Mark N. Melkerson
Director
Division of Orthopedic Devices
Office of Device Evaluation
Center for Devices and
Radiological Health

Enclosure

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Food and Drug Administration

Indications for Use

Form Approved: OMB No. 0910-0120
Expiration Date: January 31, 2017
See PRA Statement below.

510(k) Number *(if known)*
K150231

Device Name
Navigated Disc Prep Instruments and CAPSTONE Trials

Indications for Use *(Describe)*
The Navigated Disc Preparation Instruments are intended to be used to facilitate a discectomy during spinal surgery. The Navigated Trials are intended to be used to facilitate implant size selection of Medtronic intervertebral body fusion devices during spinal surgery.

Navigated instruments are specifically designed for use with the StealthStation® System, which is indicated for any medical condition in which the use of stereotactic surgery may be appropriate, and where reference to a rigid anatomical structure, such as a skull, a long bone, or vertebra, can be identified relative to a CT or MR based model, fluoroscopy images, or digitized landmarks of the anatomy.

Type of Use *(Select one or both, as applicable)*

☒ Prescription Use (Part 21 CFR 801 Subpart D) ☐ Over-The-Counter Use (21 CFR 801 Subpart C)

CONTINUE ON A SEPARATE PAGE IF NEEDED.

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510(k) Summary

June 2015

I. Company: Medtronic Sofamor Danek, USA Inc.
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Telephone Number: (901) 396-3133

Contact: Nicholas Tabrizi
Principal Regulatory Affairs Specialist
Telephone: (901) 344-1463
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II. Proprietary Trade Name: Navigated Disc Prep Instruments and CAPSTONE Trials

Common Name: Stereotaxic Instrument, Navigated Instruments

Classification Name: Stereotaxic Instruments (21 CFR 882.4560)

Classification: Class II

Product Code: OLO

III. Product Description:

The Cobb Elevator, Combo Tool, Curette, Osteotome, and Rotating Shaver are instruments that are manual accessories to the StealthStation System. These instruments can be used to facilitate a discectomy during a spinal surgery procedure. These devices are offered in non-sterile form and are reusable.

The stainless steel material used in the Disc Prep Instruments conforms to ASTM F899, ASTM A693 and ASTM A564 standards.

CAPSTONE Trials

Implant size and placement is determined by selecting the trial which provides the most satisfactory fit in the prepared disc space. Once trialing is complete, the implant of corresponding size is positioned. The new trials are designed specifically to be used with CAPSTONE and are also compatible with StealthStation. The trials will be provided non-sterile and are reusable.

The stainless steel material used in the CAPSTONE Trials conforms to ASTM F899, ASTM A693 and ASTM A564 standards.

IV. Indications for Use:

The Navigated Disc Preparation Instruments are intended to be used to facilitate a discectomy during spinal surgery. The Navigated Trials are intended to be used to facilitate implant size selection of Medtronic intervertebral body fusion devices during spinal surgery.

Navigated instruments are specifically designed for use with the StealthStation® System, which is indicated for any medical condition in which the use of stereotactic surgery may be appropriate, and where reference to a rigid anatomical structure, such as a skull, a long bone, or vertebra, can be identified relative to a CT or MR based model, fluoroscopy images, or digitized landmarks of the anatomy.

V. Identification of Legally Marketing Devices (Predicate Devices)

- Navigated CD HORIZON® SOLERA® Instruments (K140454)
  This predicate has not been subject to a design-related recall. This predicate is the primary predicate for this submission.

- Navigated CAPSTONE Trials, CLYDESDALE Trials, CAPSTONE & CLYDESDALE Inserter (K131425)
  This predicate has not been subject to a design-related recall. This predicate is an additional predicate for this submission.

VI. Comparison of the Technological Characteristics:

The Navigated Disc Preparation Instruments are intended to be used to facilitate a discectomy during spinal surgery. The Navigated Trials are intended to be used to facilitate implant size selection of Medtronic intervertebral body fusion devices during spinal surgery. These instruments are specifically designed for use with the StealthStation® System, which allows for optical navigation of the surgical instruments. These devices have similar designs as the predicate devices and incorporate the same design features to enable navigation capabilities. Like the predicate devices, the subject Navigated Taps and Screwdrivers are also made from stainless steel.

The instrument modifications detailed in this submission have no impact on the technological characteristics of either the existing instruments or the StealthStation® System.

VII. Discussion of the Performance Testing

Testing was completed to ensure the functionality and compatibility with the identified Medtronic products. The following table summarizes the performance testing completed:

Test	Description

Test	Description
Navigation Accuracy Analysis	Confirmed navigated instrument accuracy.
Anatomical Simulated Use	Confirmed instrument functionality under expected use conditions.
Navigation Simulated Use	Confirmed navigation system functionality under expected use conditions.
CAD Model Evaluation	Verified that the CAD models are accurately reflected in the application software.
Implant/Instrument Mating Conditions	Verified that the instruments can be assembled with the appropriate devices according to their intended use.
Spine Tools Package Functional Testing	Verified that the Spine Tools package has met the required interface needs of the spine application software.

VIII. Conclusions

The Navigated Disc Prep Instruments and CAPSTONE Trials have been shown through comparison and testing to be substantially equivalent to the identified predicate devices.